

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MARYLAND
at Baltimore

IN RE:

Shilondra V. Harrison

Case No.: 18-20735
Chapter 13

DEBTOR(S)

Lakeview Loan Servicing, LLC, by M & T
Bank, Servicing Agent

MOVANT

vs.

Shilondra V. Harrison

RESPONDENT(S)

**MOTION SEEKING RELIEF FROM AUTOMATIC STAY AS TO THE
PROPERTY KNOWN AS 617 MARKHAM ROAD, BALTIMORE, MD 21229**

Lakeview Loan Servicing, LLC, by M & T Bank, Servicing Agent (hereinafter MOVANT), by its undersigned counsel, files this MOTION SEEKING RELIEF FROM AUTOMATIC STAY AS TO THE PROPERTY KNOWN AS 617 MARKHAM ROAD, BALTIMORE, MD 21229, pursuant to 11 U.S.C. SECS. 362 which is a core proceeding pursuant to 28 U.S.C. SEC. 157, and for reasons states as follows:

ONE

That the above-named DEBTOR(S) initiated proceedings in this Court seeking relief under Chapter 13 of 11 U.S.C. (herinafter "RESPONDENT(S)").

TWO

That MOVANT is the holder and/or servicer of a Note secured by a Deed of Trust, which encumbers the real property known as 617 Markham Road, Baltimore, MD 21229 (the "property") (see attached Exhibit "A"), presently owned by one or more of the respondents, in the approximate principal amount of \$100,962.38, plus interest, late charges and other costs. Said Instrument is recorded among the Land Records of Baltimore City, Maryland.

THREE

That the RESPONDENT(S) is/are in default in payment of the Deed of Trust Note to MOVANT; said default involving non-payment of FOUR (4) payment(s) for the period of January, 2019, through April, 2019, in the amount of \$3,075.18, plus late charges, plus any additional payments and late charges thereon that may fall due after the filing of this motion, plus attorney's fees and costs.

FOUR

That MOVANT believes and avers that its security interest concerning the property is not adequately protected.

COHN, GOLDBERG &
DEUTSCH, LLC

ATTORNEYS AT LAW
600 BALTIMORE AVENUE
SUITE 208
TOWSON, MD 21204

410-296-2550

File #: 443901

FIVE

That the DEBTOR(S) has/have little or no equity in the property and the property is not necessary to an effective reorganization.

SIX

That MOVANT has been and continues to be irreparably injured by the Stay of S. 362(a) of the Bankruptcy Code which prevents the MOVANT from enforcing its right under its Deed of Trust.

WHEREFORE, MOVANT, prays this Honorable Court grant the following relief:

- A. That the Court enter an Order lifting the Stay of S. 362 to enable Lakeview Loan Servicing, LLC, or its successors and assigns, to enforce its rights under its Deed of Trust, which would enable it to foreclose on the property.
- B. That the Court grant such other and further relief as may be necessary.

/s/ Richard J. Rogers

Richard J. Rogers, Esquire
Cohn, Goldberg & Deutsch, LLC
600 Baltimore Avenue, Suite 208
Towson, MD 21204
410-296-2550
Fax: 410-296-2558
Email: bankruptcyecf@cgd-law.com
Federal Bar #: 01980 (MD)
Attorney for Movant

COHN, GOLDBERG &
DEUTSCH, LLC

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* * * * * CERTIFICATION OF SERVICE * * * * *

ON

**MOTION SEEKING RELIEF FROM AUTOMATIC STAY AS TO THE
PROPERTY KNOWN AS 617 MARKHAM ROAD, BALTIMORE, MD 21229**

I, the undersigned counsel of COHN, GOLDBERG & DEUTSCH, LLC, 600 BALTIMORE AVENUE, SUITE 208, TOWSON, MD 21204, certify that I am, and at all times hereinafter mentioned was, 18 years of age and that on April 25, 2019, I served a copy of the MOTION SEEKING RELIEF FROM AUTOMATIC STAY AS TO THE PROPERTY KNOWN AS 617 MARKHAM ROAD, BALTIMORE, MD 21229, by FIRST CLASS MAIL, on the respondent(s) in this proceeding to:

Shilondra V. Harrison
617 Markham Road
Baltimore, MD 21229

and by ELECTRONIC FILING NOTIFICATION CM/ECF to:

respondent(s)' counsel:
Kim D. Parker, Esquire
2123 Maryland Avenue
Baltimore, MD 21218

Nancy Spencer Grigsby, Trustee
185 Admiral Cochrane Drive, Ste 240
Annapolis, MD 21401

COHN, GOLDBERG &
DEUTSCH, LLC

ATTORNEYS AT LAW
600 BALTIMORE AVENUE
SUITE 208
TOWSON, MD 21204

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I certify under penalty of perjury that the foregoing is true and correct.

Executed on April 25, 2019

/s/ Richard J. Rogers

Richard J. Rogers, Esquire

Cohn, Goldberg & Deutsch, LLC

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Towson, MD 21204

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